

Neighbourhood Plan Consultation Statement

Appendix A (i) R14 Responses

Introduction

This paper contains all of the responses received to Neighbourhood Plan's Regulation 14 phase (1st Jan 2017 - 31st March 2017) whether these arrived within or after the consultation phase ended. Issues raised within these responses which the NP team consider are relevant to the Plan are highlighted and responses provided.

1. Joint response from WDBC and DNPA

West Devon Borough Council (WDBC) and Dartmoor National Park Authority (DNPA) joint response to the draft Buckland Monachorum Neighbourhood Plan (Draft 4.5 Dec 2016). Thank you for sending the pre-submission Buckland Monachorum Neighbourhood Plan (Regulation 14) to the Local Planning Authorities (LPAs) for our comments. This will be referred to as the Draft NP in this document, which forms the joint response of the two LPAs for the Buckland Monachorum Neighbourhood Plan area, namely West Devon Borough Council (WDBC) and Dartmoor National Park Authority (DNPA).

The LPAs fully support the initiative for the Neighbourhood Planning Group to produce a neighbourhood plan and recognises that much work has gone into the development of the NP with extensive community involvement. The LPAs commend

the Buckland Monachorum Neighbourhood Plan Group for all the hard work already put into the Plan.

These comments have been provided to assist in producing a draft neighbourhood plan for submission to the LPAs (Regulation 15). The response is based on the information provided and available at the time of reviewing the Plan, which includes the pre-submission draft Buckland Monachorum Neighbourhood Plan (Dec 2016) and other consultation documents. The LPAs have made a number of suggestions for further consideration prior to submission of a Draft Neighbourhood Plan to help ensure the Plan is successful at examination and contributes to a strong planning policy framework for the parish of Buckland Monachorum.

Key comments on the overall NP are:

1) This is a good document overall, well written and well researched, showing good understanding of the planning context.

2) Understandably, given the timeframe, the Draft NP references previous Development Plan documents rather than the Plymouth and South West Devon Joint Local Plan (JLP). Given that this document is now at pre-submission stage (Regulation 19 consultation) and is likely to be progressed to a similar timeframe as your NP, the recommendation is that you now reference solely the JLP in terms of planning policy for the part of your parish that falls within West Devon Borough. This is unlikely to cause you any major problems and you may already have this in hand.

3) There is some concern over:

a. The lack of clear site allocations for housing. Policy RD1 suggests support for 2 sites, one at Buckland Monachorum and one at Yelverton, but these sites are not

When the NP started, WD's 'Our Plan' was in course of production (but had not been adopted) and WD advised us to link the NP to Our Plan. This was abruptly withdrawn and advice was then to link it to the extant Development Plan. While the JLP has yet to be adopted, the NP has attempted to 'dock' with emerging JLP policies and the Basic Condition Statement shows how the policies align with both.

Agreed and the NP has been updated to include housing numbers, criteria, maps & site allocation. Furthermore a Site Assessment Report has also been completed which includes both allocated sites.

properly allocated in the policy, the number of dwellings on each site is not defined, no map of the sites is provided within the main body of the Draft NP, and no criteria are proposed for the sites. This is a missed opportunity to have a greater level of control over development on the identified sites. WDBC is likely to support development of the site at Buckland Monachorum, which accords with Policy TTV30 of the Draft Joint Local Plan. The NP will need to show through further assessment how the Elfordtown site at Yelverton can be developed in accordance with DNPA strategic policy particularly that relating to affordable housing, access and conservation. It is suggested that it may help clarity if policy RD1 is split so there is an individual policy for each site, thereby allowing for more locally derived criteria to be given.

b. The lack of support for any sites for development at Crapstone. Policy TTV30 in the Draft JLP identifies this settlement as a sustainable location for limited housing development and suggests a number of 10 dwellings to be provided here over the plan period. The Draft NP presents a clear rationale for favouring development at Yelverton over Crapstone, due to the provision of services at the former and lack of them at the latter. However, unless Policy TTV30 is amended in the final adopted JLP to remove Crapstone, development here is likely to come forward anyway and be supported by WDBC. By allocating a site here and providing criteria for development on it, the NP would be able to provide some local control over the process.

c. The lack of detailed site assessments to support the identified sites. Although the proposed sites have been identified in the respective DNPA and WDBC SHELAA, this should not be relied on to provide adequate assessment of the sites and the possible alternatives. Given the location within the AONB, any assessment of sites for over 10 dwellings should cover the exception tests as set out in Paragraph 116 of the National Planning Policy Framework. The SEA work that we have already advised the need for will to some extent cover this

RD1 has been split as suggested.

Not agreed. A Planning Application for 22 houses in Crapstone was rejected by WDBC (Jun 2017) on grounds of unsustainability.

Agreed. A SEA has been produced and is included as an annex to the Plan which follows nationally recognised criteria for site assessment.

requirement, but the recommendation is that in addition you provide site assessments based on the guidance available at <http://mycommunity.org.uk/resources/site-assessment-for-neighbourhood-plans/>

d. The lack of any Local Green Space designation. While green space is referenced in the Draft NP, there is a missed opportunity to protect particular green spaces that are demonstrably special to the local community, in accordance with Paragraphs 76 - 78 of the National Planning Policy Framework. Guidance on this topic is available from the Neighbourhood Planning team (SW-Neighbourhood Planning neighbourhood.planning@swdevon.gov.uk) on request, and at <http://mycommunity.org.uk/resources/neighbourhood-planning-local-green-spaces/>

e. WDBC would prefer to see a more proactive approach to affordable housing provision. A Housing Needs Assessment (HNA) has been undertaken and the Draft NP relies on existing commitments to fulfil the identified need. However, an HNA is essentially a snapshot in time and cannot predict affordable housing need in the parish for the lifetime of the NP. The recommendation is that affordable housing need is reconsidered in the light of this and the targets for affordable housing provision set out in JLP policy Dev8, and further provision made if appropriate, by identifying a suitable site and making provision for it to come forward should an up-to-date HNA identify a need for it. A commitment to update the HNA every five years could usefully be included in supporting text. You may do well to consider Community Led Housing: please contact us for more information on this. This is particularly important given that the provision of affordable housing for young people is identified as a key issue for the NP, which ties in with your strategic aims especially SA3 and SA8.

Agreed and Green Space designation is now included within the Plan to protect the Parish's recreation spaces.

Agreed. RD1 has been amended to include affordable housing and a commitment made to update the HNA periodically.

More detailed comments are:

Agreed with the caveat that the JLP is currently unadopted.

NP amended as recommended

The NP demonstrates conformity with both extant Development Plan and JLP.

Agreed and a Site Assessment Report has been completed by AECOM

1.3 It would be wise to also mention here the need for examination by an independent examiner and refer to both LPAs' local plans.

2.7 Make reference to Dartmoor's Landscape Character Assessment. It would be useful to also reference NPPF Paragraph 116 here.

3.7 A Neighbourhood plan is required to show that it is in general conformity with strategic policy of the LPA's local plan and reflects national planning policy framework to enable it to proceed.

3.10 The recommendation is that you should demonstrate conformity with the JLP as the West Devon Core Strategy is now considered out of date.

5.1 The strategic aims and the table relating them to particular policies is useful. It may also be helpful to refer to the relevant strategic aims after each policy. Sections 1 to 5 These sections provide vital background information, but you may wish to consider whether some of the text could be removed to another background document in order to 'streamline' the NP and improve readability.

6.3 The SHMA was updated in Feb 2017.
<http://web.plymouth.gov.uk/homepage/environmentandplanning/planning/planningpolicy/plymouthplan/ppevidencebase.htm>

6.4 The Elfordtown site was considered through the SHLAA process, a technical process that does nothing more than consider if the site is technically feasible, it is not an indication that the site is suitable or will comply with strategic policy. Further assessment will be required to support this allocation. See :
<http://mycommunity.org.uk/resources/site-assessment-for-neighbourhood-plans/>

6.6 This text should be updated with reference to JLP Policy TTV30 which indicates 10 dwellings for Buckland Monachorum and 10 for Crapstone.

Not agreed. The NP does not support the JLP's assessment that Crapstone is a suitable location to meet the Parish's future housing requirement until and unless social amenities are improved.

6.9 This is a clear and useful explanation of settlement boundaries. Please refer to the topic paper on settlement boundaries that has been recently consulted on and is still available to view at

<http://plymouth.objective.co.uk/portal/planning/jlp/jlpextras?tab=files>

6.11 See the comments above on affordable housing.

6.14 Please note that the indicative housing numbers set out in JLP Policy TTV30 are the numbers intended to be provided by site allocations within neighbourhood plans. They do not include windfall.

Agreed

The site review provided at Annex O is not considered to be an adequate assessment of sites for the purposes of allocation in a neighbourhood plan. <http://mycommunity.org.uk/resources/site-assessment-for-neighbourhood-plans/>

Agreed and a Site Assessment Report has been completed.

Policy RD1 – Meeting our Housing Need

This policy should ideally be split into three: one policy for each housing site and one covering settlement boundary changes, if extensions are proposed for additional settlements. Each site allocation policy should be supported by evidence that it is deliverable and : a) state very clearly that the identified site is allocated for housing development and refer to a map available within the main text of the NP, showing the boundaries of the site clearly marked.

Agreed and this has been done.

b) State the number and type of dwellings (affordable/open market) that will be provided on the site.

Done.

c) List relevant and reasonable criteria that development on the site will be expected to adhere to. This may include the delivery of appropriate infrastructure where it is considered necessary to make the development acceptable in planning terms. Elfordtown allocation - The DNP Local Plan strategic policy DMD 21 requires development to make 50% affordable housing provision. Consideration needs be given on how this is to be achieved alongside a specification for older persons housing, given there is no indication of such need in the housing needs assessment. A suggested approach would be a revised and more detailed policy that includes provision for a minimum of 50% affordable housing with a % of the remaining open market allocated to meet provision for elderly. This would satisfy community aspirations while remaining in conformity with strategic policy.

Agreed and reflected in RD1(b)

Policy RD2 - Windfall

A clear definition of 'existing settlement' should be provided, is this those settlements with a defined settlement boundary and only sites within that boundary or is it to include any size settlement, including hamlets, groups of buildings? Does this refer to all housing development in which case how are new agricultural dwellings to be accommodated for example? You may want to consider whether this policy can usefully add to existing Local Plan policy to achieve community objectives.

Amended.

RD3 This policy is very prescriptive and lacks clarity and evidence. If retained a definition of 'mixed development' should be provided, i.e. does it relate to tenure, size etc.

Amended.

Policy RD4 – Affordable housing

This does not amount to a planning policy and should be considered as supporting text. A commitment for regular (5 Yr) review of housing needs would support a

Amended.

proactive commitment to meeting affordable housing need.

See comments on affordable housing above.

Policy ED1 – ED1 (b) indicates that this policy relates to the WDBC area only, if so then this

Meeting the economic development need needs to be made explicit, if not then it will also need to recognise NP interests and comply with DNP local plan policy.

Amended

ED2 This does not meet the stated aim at para 6.36 and appears unduly restrictive and impracticable. A positively worded policy encouraging broadband provision where viable would be more appropriate.

Amended

Policy ED3 – Redevelopment of employment to non- employment use

This policy should be reworded to acknowledge Permitted Development Rights at the beginning, e.g. ‘Unless Permitted Development Rights allow for such changes, proposals for the redevelopment or change of use....etc.’

Amended

Policy ED4 – Brownfield sites

The phrase ‘to stimulate the economy’ is ambiguous. Does it refer to the previously developed land or is it an aim of the policy?

Amended

This policy is unlikely to have much effect unless two planning applications for similar development are submitted at the same time. How likely is this?

6.25 The only real protection that can be given to green space in a neighbourhood is designation as a Local Green Space. In order to be designated, Local Green Spaces must fulfil specific criteria as set out in the NPPF. ‘Most of the parish’ would not fit into this category but it may still be appropriate to designate small areas of green

Amended to include Green Space law NPPF

space that are demonstrably special to the community. See comments above.

E1 - Heritage

This should be stated in supporting text rather than in policy as policies should not duplicate existing policy. Refer to the specific relevant LPA and NPPF policies.

E2 – Local Character

Consider what this policy adds to existing policy, especially JLP Dev20. Would it be better to include a commitment for the Parish Council to produce some local design guidance, rather than having a policy that does not add significantly to existing policy?

Not agreed. Considered adequately covered by RD5

E3 – Climate change

As above – are these points adequately covered by Dev35?

E4 - Flooding The wording of this policy is a little confused and needs attention. While it is appropriate to have a policy on flooding if particular local issues are not addressed in existing policy and protocols, you need to be careful you are not adding unreasonable requirements in terms of planning applications. For example, the wording currently suggests that if you propose a development anywhere in the parish you need to prove it will not affect flood risk in Milton Combe. While this may be appropriate for places upstream of Milton Combe, you need to be more specific.

Agreed and amended

E5 This may sit more comfortably as an economic policy, consideration should also be given within the text to avoiding adverse impact on landscape, heritage assets, wildlife and habitats.

S1 - Transport

The second part of this policy is unlikely to be considered reasonable by an examiner. How do you envisage it being met? You may need to alter the wording along the lines of 'new development should be easily accessible by public transport'. See JLP figure 3.2 for a list of aspirational sustainability criteria for new development including distance to the nearest bus stop.

Agreed and amended.

S2 – Car parking

It is not clear what you mean by 'open spaces' and why they would be compromised by a lack of parking? Please include a reference for the national parking standard you refer to. I am not aware of any up-to-date national standards. See the section on parking in this government planning update: <https://www.gov.uk/government/speeches/planning-update-march-2015>

Agreed and amended

I hope you find these comments useful. Please do not hesitate to contact me if you would like further clarification on any of them.

Please note that when the NP is submitted it will need to be accompanied by the documents listed in Regulation 15 of the Neighbourhood Planning Regulations. I believe you have the necessary documents in hand, except I am not aware of a Consultation Statement having been written. Ideally you will also provide a document that summarises the evidence base for the NP, although this is not required by Regulation 15. Please do contact me if you would like any guidance on these documents.

This is the Consultation Statement

Best wishes,

Mandy Goddard

Neighbourhood Planning Specialist

2 - Mark Scoot. Applicant for Abbey Field Development in Crapstone (rejected by PC and WDBC).

The consultation response was in the form of a number of documents, some relating to planning issues outside of the NP area or comments on WD's assessment of village sustainability. The document considered relevant were 2(a) TVAONB advice to Mark Scoot and 2(b) the NP specific representation.

2(a) TVAONB response

Our Ref: TVPA/001/16

Site: Land Adjacent Abbey Park Lodge

Proposal: Residential development of up to 28 dwellings including associated works

Dear Mr Scoot,

I write with regard to the above pre-application enquiry. You have provided us with the following;

1. Copy of presentation to the Parish Council
2. Copy of draft Design and Access Statement – includes LVIA information
3. Revised indicative layout plan (Drwg. No. LL-263-SK-003, dated 15/12/16)

We have also met to discuss the proposal at our meeting of 05/12/16.

This submission (here in full) is written explicitly to support a planning application for housing in Crapstone. This is the AONB's response to the applicant (who included this letter in his input to the NP consultation. It is not considered necessary or relevant to comment on specifics here as the application was unanimously rejected by WDBC at their May 2017 planning meeting. It is included here for completeness and context.

I can offer the following advice, which I have broken into sections for ease of reference; **A. AONB Management Plan**

As background and before advising on specific aspects of the proposed development your attention is drawn to the current Tamar Valley AONB Management Plan 2014-2019 that has been adopted by both West Devon Borough Council and South Hams District Council and the relevant policies and guidance it contains. The Plan and Annexes are available from this link:

<http://www.tamarvalley.org.uk/care/aonb-management-plan/>

You may wish to review the proposal against the following specific areas within the plan as part of any planning application you submit;

Chapter 3.0 Landscape Character (Policies 1-4)

Chapter 4.0 Historic Environment and Local Distinctiveness Chapter 9.0 Planning and Development (including procedures)

It would be beneficial to also review Annex 1a) Tamar Valley AONB Landscape Character Areas and Special Qualities and Annex 1b) Tamar Valley AONB Landscape Character Areas and Special Features.

B. Description of proposed elements of scheme

It is understood that the proposed development consists of the following elements;

1. Provision of up to 28 dwellings
2. Associated works to provide landscaping and suitable vehicular and pedestrian access

It is understood that the proposed vehicular access will upgrade that as existing and

that the scale of development will consist of predominantly two-storey dwellings.

It is also understood that the application will likely be made in outline and therefore matters in relation to landscaping, design and layout would be addressed by a further reserved matters application.

Following our meeting you provided a revised indicative layout plan to show the possible form of development.

C. Principle of development – Major development

Having reviewed the information and from our discussions on the various aspects of the proposed development it is my opinion that the proposal would not constitute major development in the context set out within Section 9.9 of the adopted TVAONB Management Plan 2014-2019 which seeks to set out indicators of major development in respect of paragraph 116 of the National Planning Policy Framework (NPPF).

My conclusion that the development is not major development is based upon an assessment against the four indicators set out within Section 9.9 as follows;

Indicator 1 - Where the scale of development is likely to have a detrimental visual impact that harms the scenic quality of the AONB, either within the AONB or in it's setting;

Assessment – The site is well screened from views due to the existing boundary that is to be retained and reinforced. The site is on relatively level ground and located to the edge of the existing settlement.

A visit to the site and surrounding area as well as the information provided as part of

the LVIA work indicates that the site is not readily perceptible from an array of viewpoints.

Suitable boundary reinforcement and structural planting throughout the site could further mitigate the proposed development's visual impact.

The revised scheme indicates that the proposed development would be set further within the site reducing its roadside presence and retaining the rural character of the hedge that bounds the main road.

The site lies opposite an area that has a very urban form at Abbey Close, Seaton Way and Morely Drive.

Indicator 2 – Where the location of development would erode the special qualities and features of the area of the AONB where the development is proposed (landscape, cultural biodiversity tranquillity, etc.);

Assessment – The site is currently given over to paddocks and pastureland. The site is located within the Landscape Character Area (LCA) designated as “River Tavy Middle Valley”.

There are a number of special qualities of the AONB that relate to LCA as a whole, but those specific to the site will relate to any wildlife resource, visual impact, tranquillity or heritage. The proposed development will remove some of the pastureland and overwrite the land use with a new residential development.

The development would see the retention of the hedges as well as further works to provide new hedge boundaries and reinforcement planting.

The site does not contain any obvious historic remains and the landform in terms of boundaries would remain relatively unaltered.

The site would see a greater use by vehicles and pedestrians, however the presence of the main road and housing opposite the site as previously noted means that the tranquillity levels in this location are not as high as in other lesser accessible and remote sections of the AONB.

No information has been provided as to whether any protected species are present on site and so at the present time I am of the view that subject to a satisfactory ecological appraisal, mitigation, suitable lighting schemes and landscaping then the impacts of the development will not be sufficient to erode the special qualities for which the area is noted to a level that would render this development as major.

That is not to say that there would be no impacts, but that they are relative in scale to the development proposed and the existing context of the site.

Indicators 3 & 4 – Where the type of development is not directly compatible with its surroundings; and or

Where the development would conflict with the economic and social needs of local communities and the guiding principles of sustainable development.

Assessment – The site is located adjacent to the existing settlement and is readily accessible from the road. The development appears to be capable of being accommodated within the site without removing key landscape features such as the hedges.

The revised indicative layout shows a cellular layout could be achieved with aspects of the site emulating the quadrangular form seen in many of the farms within the

locality. Aspects such as the pedestrian pathway being located away from sight behind the hedge would improve the scheme still further. The relatively low density of development across the site will help to retain and reflect the rural character of the area. Other aspects such as materials for parking areas, roads, kerbing and boundary treatments will be pivotal in ensuring any development truly reflects local character.

The development is more akin to the older development patterns in and around Crapstone as opposed to the less sensitive developments of the late 20th/early 21st centuries.

Whilst there will be a visual impact it is somewhat localised and mitigation through suitable landscaping would most likely be successful, given the ability to break up the development with plantings and the ability to screen using hedges as proposed and existing.

The development will be read in conjunction with existing development of the same nature in a location towards the edge of the settlement. The development is not considered to be incompatible with its surroundings.

The development is to provide housing and it is not anticipated that this would conflict with the social and economic needs of the local community. The Parish is preparing a Neighbourhood Plan and has a good body of evidence as to what the local communities consider to be their needs and priorities.

We would stress that active and continued engagement with the local communities will help inform the development and may also provide the opportunity for the development to offer enhancements to the wider area benefitting future and existing residents.

Assessment Conclusion:

Based upon my assessment of the revised scheme against the four indicators of major development (above) and subject to the scheme coming forward in manner akin to that shown on the indicative plans I am of the view that it is not major development within the AONB.

D. Assessment of quality of LVIA information

The LVIA information as submitted indicates that a suitable spread of viewpoints has been selected to review the site from the various publicly accessible roads and footpaths. These include V9 that is located within the Dartmoor National Park. Viewpoints V5, V7 and V8 are also very useful as they capture the views from both Stokehill Lane and Green Lane.

The current information would appear to be sufficient to show the extent of views available from the primary routes that receptors would use.

It is acknowledged that any submission is likely to be an outline application. However, given that the scale of development is indicated as being predominantly two-storey within the design and access statement and the importance of the landscaping to help mitigate visual impact, it is suggested that indicative montages might be of assistance to the LPA.

E. Other matters

The success of any scheme in this location will be governed by a number of factors. As I am advising from the perspective of the AONB I feel it appropriate to include some of the key aspects that need to be considered that may require to be established and controlled at the outline application stage, but that might possibly not be

detailed until any reserved matters application.

- Detailed landscaping plans that retain rural character and reflect the LCA and settlement need to be developed to ensure that the development integrates properly into this section of the AONB

- It is strongly urged that a suitable design brief is developed (perhaps subject to condition) that ensures local materials and detailing are included within the scheme.

- Lighting, signage and other forms of street furniture need to be low key and limited in order to reduce any urbanising impacts.

- Any scheme should provide the opportunity for ecological enhancement such as bat bricks, permeable structures, careful placement of lighting (if required), buffers to hedges, etc.

- There is the opportunity to provide for interpretation on site or within the locality in respect of the AONB landscape and we would suggest that this be incorporated in any submission.

F. Conclusions

Having had the benefit of reviewing the revised layout plan and based upon

the other information that has been provided to date, I can confirm that the TVAONB unit is of the opinion that the proposed development would not prejudice the conservation or enhancement of the AONB.

The content of this letter is intended to give you advice to help you progress your scheme accordingly. I trust the above information and advice is sufficient for your purposes. Please note that the advice given in this pre-application response is provided on the basis of the information submitted and on the basis of existing policy. The advice is officer opinion only and is provided without prejudice to any future consultation response made by the TVAONB on planning applications for this proposed development or others differing in nature on this site.

Yours sincerely,

Ben Dancer

AONB Planning Officer

**2(b) Buckland Monachorum Neighbourhood Plan Representations by Mark
Scoot
March 2017**

1. This representation has been submitted in respect of the emerging draft Buckland Monachorum Neighbourhood Plan and is supported by the following documents:
 - a. Copy of the Inspectors Decision in respect of planning appeal reference APP/Q1153/W/15/3138936 (Land at Butchers Park Hill, Tavistock);

- b. Planning application reference 0147/17/OPA – scheme layout and AONB officer consultation response;
- c. Copy of the South Hams and West Devon Village Sustainability Assessment Framework – summary of consultation responses.

2. General Comments

- 3. Whilst supportive in principle of the preparation of a Neighbourhood Plan, I have significant concerns about the draft version as currently proposed and the lack of relationship to the emerging Joint Local Plan / associated evidence base, particularly given that all parties accept that the adopted development plan is significantly outdated, is not consistent with the National Planning Policy Framework (the Framework) and was not determined to be sound as a basis for consultation.

The NP has been amended where necessary to conform with the emerging JLP (not yet adopted) on the advice of WDBC. IT also conforms with the extant Development Plan.
- 4. Repeated references are made to the Our Plan document and it is clear that it has been used to inform the emerging NP. The Our Plan document failed the most basic tests of plan making and was withdrawn because it clearly would not have passed the necessary tests in preparing a development plan document. Most fundamentally the document was being prepared without considering the requirements of the entire housing market area and therefore in no circumstances could it possibly have identified the full Objectively Assessed Need for Housing. The document was also fundamentally flawed in

See above

The NP, PC and WDBC rejects this opinion

terms of calculating future housing requirements. On this basis no weight should be given to the document.

5. The Joint Local Plan is at a very early stage of preparation, has not been tested at examination and should be accorded no weight at this stage or relied upon as a tool for preparing Development Plan Documents.

This directly contradicts the advice given by the LA (WDBC)

Former Golf Driving Range, Crapstone

6. I am promoting a planning application for the development of up to 22 residential units (incorporating 40% affordable housing) at the above site, under application reference 0147/17. The site has been considered on several occasions by West Devon Council through the SHLAA preparation process and found to be acceptable subject to the potential impact upon the Tamar Valley AONB. The AONB has been fully involved in the preparation of the application and they have confirmed that the application does not constitute major development and is acceptable in principle from their perspective. Their response forms part of the application submission and demonstrates that the site is a suitable infill opportunity. Similarly, the consultation response from the Education Services department raises no issue of concern regarding primary school accessibility or capacity.

This application has been rejected by WDBC Development committee and is now the subject of appeal.

Specific Comments

Paragraph 2.7

6. At paragraph 2.7 the NP notes the importance of the landscape character of the area. A key benefit of the former golf driving range site is that it can accommodate development and contribute towards the NP objectives without any detrimental landscape impacts or any detrimental impacts upon the Tamar Valley AONB or National Park. This is a significant benefit of the site when considered against both the proposed allocation in Buckland Monachorum and the allocation in Yelverton (which is within the boundaries of the National Park).

Not supported by the Site Assessment Study

Paragraph 2.11

7. The NP correctly identifies the key issue of the lack of affordable housing in the area and the most recent Strategic Housing Market Needs Assessment (2017) shows the ongoing requirement for more affordable housing. The former golf driving range offers the opportunity to provide a significant amount of affordable housing that will be specifically provided to meet local need. The draft NP incorrectly references an older SHMNA which again highlights the problems caused by trying to progress a plan without any strategic framework. There is an outstanding need for affordable housing and as worded the draft NP will not address this key issue.

The NP reflects the findings of the Housing market analysis conducted for the Joint Local Plan

8. It is relevant to note that the emerging Joint Local Plan will seek under 30% affordable housing provision within West Devon. Therefore the subject scheme will deliver more community benefit than the draft allocations both in terms of overall unit numbers and percentage.

9. The scheme will also serve to widen the mix of housing in the area by providing smaller market units for families in accordance with the objectives of the NP and the Framework.

Paragraph 3.11

10. This paragraph succinctly summarises the entire problem of proceeding with the NP in light of a void of policy guidance at a district wide level. As already noted, no weight can be given to Our Plan or the Joint Local Plan. Despite this it is clear that the decision has been made to progress the NP without any context or strategic guidance. Whilst this will allow for progress in the short term, it is an erroneous approach as the NP will not link to other guidance and will need to be reviewed in the short term.

The Basis Condition Statement shows the linkages between the NP and both Extant Development Plan and emergent JLP

Residential Development Page 10

11. At bullet one the assumption is stated that there will be a maximum of 20 houses during the remainder of the plan period. Firstly and as already noted, this figure is taken from a draft plan that was abandoned as it clearly failed the necessary tests and therefore cannot be given any weight. Secondly, both the adopted development plan and emerging plan set minimum rather than maximum housing targets and this has been misinterpreted in the draft NP.

See JLP which derives this figure.

12. At bullet 4 the draft NP appears to promote new residential development in the National Park on the basis that it would represent the most appropriate location. This is clearly inappropriate and at odds with national guidance. Equally, there is no evidence to demonstrate that new residential development in Crapstone is not sustainable. The entire premise of the draft NP in this respect is flawed and needs to be amended to fully understand the constituent elements of ensuring that development is sustainable and meets the requirements of the Framework. Without this the draft NP will remain fundamentally flawed.

DNPA require 600 houses over the period of which 60% should be in Local Centres (Yelverton being one of 6). Briar Tor (Ph 2) and the proposed development meets this demand.

Paragraph 4.5

13. The NP recognises the importance of some growth to sustain local facilities. Given that the West Devon SHLAA raised no issues of concern (beyond potential impacts on the AONB – the AONB Unit has already confirmed that they have no concerns in this respect) and the fact that the former golf driving range site received the highest level of public support when the NP Steering Group undertook their own consultation, it is impossible to understand how the conclusion can be reached that the NP is being formulated in accordance with the wishes of the local community – particularly given the wide range of benefits that the scheme will deliver. The scheme will provide a mix of housing including affordable, cheaper smaller units for starter homes and the opportunity for older residents to downsize.

Not true when all consultation responses are considered.

Section 5 – Strategic Aims

14. The Strategic Aims are supported. However, the detail of the NP does not outline how these will be delivered and by unnecessarily constraining growth the Aims will not be achieved. This is to the detriment of the community as a whole.

Paragraph 6.3

15. The draft NP **references an historic SHMNA issued in 2013**. This again highlights the irreconcilable problem of trying to advance a NP in advance of a thorough understanding of the wider context within which it should come forward. The evidence base for the emerging development plan includes a SHMNA issued earlier this year. This document should be used in support of the emerging NP rather than an outdated document. The paragraph goes on to identify the very high levels of home ownership in the plan area. The former golf driving range scheme provides the opportunity to diversify the housing stock of the area.

The NP reflects the updated WDBC SHELAA which does not support development on the ex Golf Driving range.

Paragraph 6.4

16. A summary of the characteristics of each settlement is provided and notes that Crapstone has absorbed the majority of the parishes residential development over the last 25 years. This demonstrates that Crapstone has traditionally be viewed as a sustainable location for residential development.

The fact that the NP Consultation Day results favoured the former golf driving range for development over any other location demonstrates that this is still the case.

See comments above.

17. Reference is also made to the District Council template to assess the sustainability of villages. As part of the evidence base in the emerging Joint Local Plan the Councils have prepared the 'South Hams and West Devon Village Sustainability Assessment Framework – Summary of Consultation Responses'. A copy is attached. This considers the sustainability of the West Devon villages and goes on to give each village a score with a minimum requirement of 10 points in order to be viewed as sustainable. The report incorrectly states that there is no shop in Crapstone and when this is added in, the settlement scores 26.5 points - of no material difference to the Buckland Monachorum score of 29 points. Crapstone is a sustainable location for development.

18. It is also highly relevant to note that paragraph 5.10 of the emerging draft Joint Local Plan identifies both Crapstone and Buckland Monachorum as sustainable villages which can accommodate growth. Of course, no reference is made to Yelverton as it does not form part of the plan area. There is no doubt that the current and emerging development plan view Crapstone as a sustainable location for housing development.

Paragraph 6.6

19. Given that the authority has not determined the overall OAN, currently cannot demonstrate a 5 year supply of land for housing and that Our Plan / the emerging Joint Local Plan should be accorded no weight, any conclusions on the **minimum** housing requirements is premature and not informed by any evidence. The evidence submitted by the appellant during the Butchers Park Hill inquiry (on which I acted as planning consultant) demonstrated that the proposed minimum housing targets set out the emerging plan did not meet the full OAN. At that time Our Plan proposed at least 216 units per annum and our evidence suggested in excess of 300 units per annum. Despite the fact that the planning authority contended that a five year supply could be demonstrated until the week before the inquiry (indeed even claiming more than a 7 year supply), they accepted on opening of the inquiry that this was wrong and that a 5 year supply did not exist. They did not challenge any of the appellant's evidence, including the fact that the supply was at most 2.6 years. This is confirmed at paragraphs 6 and 7 of the attached decision. This confirms that significantly more land for housing is likely to be required throughout the district and therefore through the emerging NP. This again highlights the irreconcilable problem of progressing in a strategic void.

WDBC state they have a secure 5 year land supply and this is evidenced in the JLP

Paragraph 6.8

20. The concept of promoting new development in close proximity to existing services and as a logical extension to settlements is supported and the development of the former golf driving range will fully comply with this aim. However, the alleged imbalance between services and housing is disputed and it is clear that further development in Crapstone is acceptable. The

proposed scheme of up to 22 units will only increase the dwelling stock by a small percentage. This will help to support local facilities and not place an undue strain on any community facilities. This is evidenced by the fact that, as at the time of writing, all statutory consultation responses on the application support the scheme.

It is due to the lack of community facilities that further development of Crapstone is not supported.

21. The assertion that defined boundaries have given rise to inappropriate development is incorrect. As each application has come forward it has been assessed against planning policy and found to be acceptable. Development that is not acceptable or sustainable would simply not be approved. Further to this, settlement boundaries have been used to identify where development is acceptable in principle. It is therefore factually incorrect to state that they have somehow perpetuated unsustainable development.

The PC does not support this view and it is one of the principal reasons for developing a NP; to ensure that in future, development is sited close to existing community facilities.

Paragraph 6.9 and 6.10

22. As with the previous paragraph, the assumptions behind the assertions made are incorrect.

There is no evidence that settlement boundaries cause overdevelopment / cramming or allow development to proceed that is not sustainable. For the same reasons as set out in respect of paragraph 6.8, these sweeping generalisations are incorrect, inaccurate and should be deleted.

23. It is also difficult to understand the decision to then continue to use settlement

boundaries if they genuinely cause such problems. This highlights a lack of consistency in approach.

Available Sites for Development

24. As already noted, the former golf driving range at Crapstone should be allocated for residential development in accordance with the current undetermined application. The site is a logical infill opportunity in a sustainable location with no objections from statutory consultees. Added to this, when the Neighbourhood Planning Open Day considered all potential sites, this site received the highest levels of support and lowest levels of objection. Further to this, the site is also preferable to both sites allocated for development as summarised below:

- a. Yelverton – For clarity, the Yelverton site is in the National Park and therefore cannot be seen to contribute towards any future housing target set for West Devon. The concept of reaching an ‘accommodation’ with the National Park to locate further development in the National Park is not in accordance with the aspirations of the Park or the Framework. The promotion of a market led scheme in the NP is not in accordance with the Framework;
- b. Cuxton Farm, Buckland Monachorum – the site is wholly situated within the AONB and could well constitute major development given that it would significantly extend the settlement in a prominent

Not agreed and not supported by NPSG, PC, WDBC or the Site Assessment Report.

location with far reaching views into and out of the site. The allocation of the site could well therefore be in direct conflict with the Framework which only permits major development in AONB's in exceptional circumstances. There are no exceptional circumstances that could justify the allocation and the housing needs of the area can readily be met elsewhere. The Council SHLAA has repeatedly recognised this problem and states that only 5 dwellings could come forward – presumably as rounding off. The allocation of three times as many units into open high profile countryside is inappropriate. The earlier section of this representation has addressed in detail the flawed logic of allocating a site for housing purely on the basis that it is closest to a primary school. This also ignores the fact that there is no footpath between the site and school so in accessibility terms the advantages of the site are not significant. The draft NP itself also recognises that the entire site is not suitable for development because of landscape impacts (and presumably the policy conflict arising from development in the AONB) and states that up to 15 units may be suitable. **There is no evidence to justify how this arbitrary capacity has been arrived at other than the fact that the two draft allocations reach the *minimum* housing figure.** The proposed amendment to the Buckland settlement boundary demonstrates that the allocation of this site will protrude well beyond the existing settlement and into the open countryside.

Housing allocations follow the analysis of both Local Authorities development plans. There is no evidence to suggest that the Parish needs in excess of these quotas.

Settlement Boundaries

25. The settlement boundary for Crapstone should be extended to include the part

of the former golf driving range site currently being promoted under application reference 0417/17.

Education

26. The draft NP places great weight on the relative proximity of the Buckland Monachorum primary school to the allocated site and this is the over-riding reason for the draft allocation. This emphasis is misplaced and sustainability should be considered in the whole – for example including the impact on the AONB / proximity to employment and shops for example. The consultation response from Devon County Council Children’s Services on the former golf driving range application raises no issues of concern about the development of the site and notes that the site is within the catchment of Buckland primary school. The development of the former golf driving range site will represent sustainable development.

3 - Representations (3) from Andrew & Rachel Young

3.1

From: Andrew Young <andrew.young@decidua.co.uk>

Date: 17 April 2017 at 10:10:03 BST

To: <ric.cheadle@hotmail.com>

Subject: Neighbourhood Plan - further comments

Dear Ric,

Although the deadline for commenting on the Neighbourhood Plan has passed, we do so again having read the Parish Council's objections to the recent planning application for Abbey Meadow since these would apply equally to Site 1 in the Neighbourhood Plan:

Five-year land supply

We could not find the objectively assessed housing needs in the annexes to the Joint Local Plan (JLP) as you stated. There are figures under Policy SPT 3 which are for the whole Local Plan area and not location-specific. The only JLP figures relating to housing needs in Buckland Monachorum parish are under Policy TTV 30 where both Crapstone and Buckland are each assessed as able to accommodate about 10 dwellings.

Development on open countryside on a greenfield site in the AONB

The Parish Council cites Core Strategy Policy H31 to oppose development at Abbey Meadow yet it disregards this when proposing development at Site 1 in the Neighbourhood Plan which is also a greenfield site in open countryside in the AONB. There needs to be much greater consistency of approach.

The OAHN is calculated on the whole of the Housing Area (ie WD, SH and Plymouth. WD then apply this to towns and villages. The villages of Buckland and Crapstone are allocated 20 houses during the period with the location for these to be decided through the NP process.

Settlement boundaries and extent of development

The Parish Council points out that 28 dwellings at Abbey Meadow would exceed the JLP indicative levels of new housing in Sustainable Villages by 200%. (Policy TTV 30). However, 30 starter homes on Site 1 (with provision for more of other types) would exceed the indicative level for Buckland Monachorum by an even greater margin. What appears to be unacceptable in Crapstone is being actively proposed in Buckland! You also state that the Abbey Meadow development would prejudice the development boundary but this logic does not appear to apply to the Neighbourhood Plan proposals for Site 1.

Buckland is considered a more sustainable location for new housing and the proposed allocation (20) meets the LA quota for the Parish.

We have stated before that the current draft of the Neighbourhood Plan relies too much on scoring for amenities. Factors such as impact on open countryside and the historic environment are mentioned in the current draft but hardly considered when selecting sites for development. We consider that the JLP proposals for about 10 dwellings at Crapstone and Buckland Monachorum are sustainable and would have the least impact on the AONB and historic environment. Please could this be reflected in the Neighbourhood Plan.

See above

3.2

Further to our objection dated 20th March, we can see from the Planning Statement for Abbey Meadows that this site secured more support for development than any of the other 12 sites proposed at the 2016 Consultation. The current draft of the Neighbourhood Plan does not explain why this body of evidence was disregarded. Instead, it gives too much weight to scoring access to local amenities whereas in practice the arguments are much more finely balanced and probably better reflected by the Consultation responses.

Not the case if all the consultation events are considered. More concern over development at Crapstone has been evident than for any other site considered. Furthermore, this application has been rejected by WDBC

3.3

Thank you for the opportunity to comment on the draft Neighbourhood Plan and we appreciate all the work it has involved.

We do not agree that the development boundary around Site 1 in Buckland Monachorum should extend so far to the west. Since the site is only capable of supporting a development of 15 houses while maintaining local character (Annex O, Site 1), it would be better to identify which part of the site is usable and to draw the development boundary around it. In the current draft, it is difficult to understand how such a large area which is on a prominent ridge has been assigned for development when it clearly runs counter to environmental policies, especially with regard to preserving the character of the village and AONB (Policies E1 and E2).

At the 11th March consultation meeting in Buckland Village Hall, we understood that 30 low-cost homes are required in the parish and they had all been proposed for Site 1 in Buckland. If this site is being asked to support two thirds starter homes where practicable and viable (Policy RD3), does it mean that it is in fact being earmarked to accept 45 houses or more? How can either figure be reconciled by the site assessment at Annex O which limits the development to a maximum of 15 homes and Annex I(i) which identifies the site capacity as just 5 houses?

A total of 20 homes is proposed

Given the above concerns, further consideration must be given to developing some of the Golf Driving Range (Site 8) in Crapstone. The arguments made against this on grounds of sustainability are more marginal than the Plan suggests; people drive out of Buckland for their various needs just as much as others drive into Buckland to drop children into school or use the other facilities. The issue of prior development is also more finely balanced than the Plan acknowledges and it should be recognised that recent developments in Crapstone have taken place on brownfield sites whereas developments in Buckland have all been on greenfield land.

4 - Representation from Historic England

Dear Mr Cheadle

Thank you for your Regulation 14 consultation on the Buckland Monachorum neighbourhood Plan.

Please accept my apologies for not getting a response to you before now. We hope that our comments can still be accommodated within the Plan preparation process.

This is our first involvement with the Plan since we offered general advice in a letter of introduction sent when the application for designating the area was submitted in the autumn of 2014. We note and applaud the Plan's intention to recognise and protect the locally distinctive character of the area, and appreciate its intention of providing for the future needs of its community.

In this respect the focus of our attention is on the allocation of sites for residential development in Buckland Monachorum and Yelverton – policy RD1. It is planned that the Settlement Boundaries will be extended to accommodate them as set out in Appendices K9(i) & (iii).

The extensions are predicated upon the suitability of two sites set out in Annex O on the Plan's website. Site 1 at Buckland Monachorum lies close to the Grade II*Cuxton Farmhouse and looks as though it may abut, or certainly be near to, the Conservation Area. The setting of other designated heritage assets may also need to be considered.

Annex O highlights that development should not adversely impact on the landscape (there is no specific reference to heritage considerations) and a maximum of 15

homes is suggested - though it is not clear how the suitability of this quantum has been determined. We assume the report draws upon Annex I(i), the WDBC Site Assessment report for Buckland Monachorum and Crapstone, which more pointedly draws attention to the potential for development of the site to harm the setting of the Farmhouse and the need for pre-application assessment and evaluation of potential archaeological remains.

Neither of these reports provide evidence to demonstrate that the site can deliver housing without causing harm to designated heritage assets. While policy safeguards to protect the significance exist elsewhere within the plan as well as in overarching Local and national policy (ie the NPPF) the proposed policies within the Neighbourhood Plan need to show that the principle of allocating areas for development is deliverable as intended without causing harm to designated heritage assets. At present it is not clear how relevant heritage assets have been determined or how their significance has been understood and used to inform the proposals.

There is less detailed information to support the site allocation at Yelverton (Site 17 in Annex O), with reliance perhaps being placed on the DNP SHLAA report at Annex I(ii). Relevant heritage assets here may be less easily identifiable but it is still necessary to undertake an explicit assessment exercise to demonstrate that such an allocation will not cause harm to their significance.

It should be noted that it cannot generally be assumed that SHLAA methodology will accurately identify and assess appropriate heritage assets to the extent necessary to confirm the suitability of sites in accordance with the NPPF and PPG.

Unfortunately therefore, as the Plan stands, we do not believe that appropriate evidence has been provided to demonstrate the necessary level of conformity with local and national planning policy for the protection of the historic environment. We must also advise that there may well be a likelihood of significant environmental

The SEA completed on receipt of these comments seeks to address EH's concerns

effects, prompting the need for a Strategic Environmental Assessment (SEA). It may therefore be prudent to undertake an SEA Screening Opinion.

We appreciate that there may be further evidence to support the proposed allocations and address the points we have raised above which is not on the Plan website. We would therefore be happy to receive this and to review our position accordingly.

Guidance on Site Allocations and Setting is available on our website and can be downloaded at:

<https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>

<https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>

We would also encourage liaison with the historic environment team at West Devon Borough Council.

Please address any further correspondence for my attention.

Kind regards

David Stuart

David Stuart | Historic Places Adviser South West
Direct Line: 0117 975 0680 | Mobile: 0797 924 0316

Historic England | 29 Queen Square | Bristol | BS1 4ND

We have launched four new, paid-for Enhanced Advisory Services, providing enhancements to our existing free planning and listing services. For more

information on the new Enhanced Advisory Services as well as our free services go to our website: HistoricEngland.org.uk/EAS

5 - Representation from Ian McNeill

ian mcneill <mcneill207@hotmail.com>

DNP 14/073 and Table 7.3 identifies this site for 30 dwellings and notes '[the] need to account for trees currently making up the site frontage.' I find this language worryingly ambiguous: why doesn't it say that there is a 'need to preserve these trees and the related hedgerow'? The wording smacks of wriggle-room being provided for a developer to haggle.

6 - Representation from Ed Persse

Ed Persse <ed.persse@ejfpplanning.co.uk>

The following are my comments relate to the residential section of the draft neighbourhood plan.

My primary focus relates to a parcel of land adjacent to Binkham Hill Yelverton. The site at Binkham Hill should be considered as an option under paragraph 6.9 of the residential section. It is understood that Annex K (ii) shows a potential site for development. However, it is our view that the potential development of this site is not without its problems, these are discussed below. Accordingly, for the neighbourhood plan to be truly fit for purpose, an alternative site(s) should also be considered.

The Binkham Hill site is immediately adjacent to the existing settlement limit, and

The site at Binkham Hill was not identified when the NP consultation was conducted but it has subsequently been included in the SEA and Site Assessment Report. It is seen as having merit for future potential development although the selected site off Meavy Road is seen as delivering a more sustainable solution.

the allocation of this site would go some way to addressing the concerns set out in paragraph 6.9 which states while the impact of this policy has been to contain development and prevent rural sprawl it has three drawbacks; firstly, it can promote housing being crammed in inappropriately, secondly there is now so little room remaining for development within existing SBs, this policy will, by itself, constrain further development and thirdly, many of the facilities which existed when the SBs were first drawn no longer exist thereby challenging the future sustainability of the original SB. The site at Binkham Hill is within easy walking distance of the centre of the town and the services that are available.

In terms of paragraph 6.11 whilst it is understood that the neighbourhood plan accepts that the current affordable housing need has been met, there will undoubtedly be a future need and the site at Binkham Hill would be available to help meeting that need.

The Parish Council should be aware that the site at Binkham Hill was submitted to the Dartmoor National Park Authority as part of their call for sites in relation to the Local Plan Review. As stated above the site referred to in Annex K(ii) I would suggest that creating an access suitable to cater for the development of the site is highly likely to have an adverse impact on the substantial historic stone hedge of heritage value and healthy mature trees that are set on the roadside boundary. Creating a safe access serve the development of the site is likely to require the removal of at least part of this boundary, this concern was recognised in the Dartmoor National SHLAA review of 2014. There is the potential for an access off the private drive serving Elfordtown however such an access is unlikely to be acceptable. Furthermore an access be created on to Elford Park however, this has considerable visibility issues onto Meavy Lane. The site assessment carried out for the neighbourhood plan also states special attention will need to be given in order to provide safe pedestrian access to the services at Yelverton.

Therefore the Parish Council is requested to formally consider the allocation of the

Actioned. See Site Assessment Report

Type to enter text

site at Binkham Hill as a viable alternative. The site has easy access to centre of Yelverton which as is stated in the draft plan has unrivalled access to services such as the health centre, bus services and shops, this site was seen as ideally located for the provision much needed houses suited to more elderly residents. The site is well related to the town and access can be created from Binkham Hill or off the Dousland Road. The site has a reasonable tree screen along the Dousland Road and would also be seen in the context of the existing development at Binkham Hill. There is an existing footpath from Binkham Hill back to the town centre.

Under policy RD1 the Binkham Hill site should be considered as an alternative site to the site allocated for Yelverton for the reasons set out above.

It is suggested that the neighbourhood plan may benefit from waiting to see the outcome of the progress of the Joint Local Plan and the Dartmoor Local Plan Review, otherwise there is a real threat that the neighbourhood plan will be out of date just after its adoption and will need to be reviewed to assess its compliance with the new plans.

7 - Representation from P Scott

P Scott <peterdscott@hotmail.com>

I strongly object to any further building around Cuxton Farm and Cuxton Meadow in Buckland. The new development has already negatively impacted on the view of the ridge line above Buckland and further development would make the situation worse.

Many people enjoy the "Buckland Mile" walk and the present development is visible from across the valley as a bright yellow disaster out of keeping with the other buildings in the village - please do not add to this mistake along the ridge or below

the existing development.

8 - Representation from Police Crime Officer (WD and DNP)

Thank you for requesting consultation on the Buckland Monachorum Neighbourhood Draft Plan.

My role as the Police Designing out Crime Officer (DOCOC) (formerly Police Architectural Liaison Officer – ALO) is to act as the single point of contact for the planning authority, architects and developers, in providing advice and recommendations on designing out opportunities for crime, fear of crime, antisocial behaviour (ASB) and conflict in the built environment. This is achieved by reviewing relevant planning applications (please see protocol attached), in conjunction with the requirements of the National Planning Policy Framework (NPPF) and Local and Neighbourhood Plans to ensure the aims and objectives of this concept have been considered by the applicant.

As Neighbourhood Plans are used in the planning decision process and ‘crime and the fear of crime’ are material planning considerations, therefore a determining factor in planning consent, this should be referenced within the Neighbourhood Plan.

It should also mention that applicants should be able to demonstrate the following principles of Crime Prevention through Environmental Design (CPTED) and where these have been implemented in the design and layout of new development:-

- **Access and movement** - Places with well-defined and well used routes with spaces and entrances that provide for convenient movement without compromising security.

The NP questionnaire included questions on people’s concern about crime and personal safety and most had no concerns. The Building for Life criteria include measures to enhance safety and wellbeing but no other specific measures are considered necessary.

- **Structure** - Places that are structured so that different uses do not cause conflict.
- **Surveillance** - Places where all publicly accessible spaces are overlooked.
- **Ownership** - Places that promote a sense of ownership, respect, territorial responsibility and community.
- **Physical protection** - Places that include necessary, well-designed security features.
- **Activity** - Places where the level of human activity is appropriate to the location and creates a reduced risk of crime and a sense of safety at all times.
- **Management and maintenance** - Places that are designed with management and maintenance in mind, to discourage crime.

By considering the above will also enable compliance with the following legislation and planning policies:-

- **National Planning Policy Framework (NPPF)** at paragraph 7 makes a clear statement that sustainable development is at the heart of its planning policy, defining three fundamental dimensions: economic, social and environmental. Crime and the fear of crime, as well as conflict and acts of antisocial and unacceptable behaviour, can directly impact on all three of these dimensions.

This has been reinforced throughout the NPPF, specifically at point 58 (Requiring good design) & 69 (Promoting healthy communities), which requires local authorities to produce '*Local and Neighbourhood plans*' with a specific aim to create:-

Safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and

Safe and accessible developments, containing clear and legible pedestrian routes,

and high quality public space, which encourage the active and continual use of public areas.

- **Crime and Disorder Act 1998, specifically section 17** which directs that we must have community safety embedded into our planning, our policy and our operational day-to-day activity. It states *‘Without prejudice to any other obligation imposed on it, it shall be the duty of each authority to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can, to prevent, crime, fear of crime and disorder in its area’.*
- **Emerging PCC, SHDC & WDBC Joint Plan** - relevant in creating safe, secure and sustainable communities - **and any other relevant local planning policies**
- **Secured by Design (SBD)** - *SBD is a crime prevention initiative owned by the Mayor’s Office for Policing and Crime (MOPAC) on behalf of the UK police services. SBD aims to reduce crime, the fear of crime and opportunities for antisocial behaviour and conflict within the built environment by applying the attributes of CPtED in conjunction with appropriate physical security measures.*

I look forward to providing advice and recommendations on future planning applications that sit within my remit of response but in the meantime I hope the content of this response is considered constructive and useful but please do not hesitate to contact me if any clarification is sought or I can assist further.

Thank you

Kind regards

Sarah-Jane

Sarah-Jane Barr
Police Designing out Crime Officer - South Hams, West Devon, Torbay & Dartmoor
National Park
Totnes Police Station
Ashburton Road
Totnes
Devon
TQ95JY

Telephone 01803 860456
(Internal 4656)

Email SarahJane.BARR@devonandcornwall.pnn.police.uk

9 - Representation from Mike Stanton

Mike Stanton <wba.stanton@btinternet.com>

I have no specific comment to make. I do, however, wish to thank all those involved in developing this plan. Well done!

10 - Representation from Tom Wheating

Tom Wheating <tomwheating@hotmail.com>

Dear Sir/Madam,

I live in Midella Road, Yelverton and keep hearing reference to a proposed new cycle path between Yelverton and Burrator. It is my understanding that this proposed new path will come down Westella Road (presently it seems to be mainly used as a car park extension for Yelverton and Yelverton Surgery), along Midella Road into the field to the East of Kirkella Road and on to Burrator. I cannot find reference to this proposed new cycle path on your Neighbourhood Plan.

Could you please let me know the situation or refer me to a website which might provide further information. I also keep hearing of various meetings during which the subject may come up but only after the event as they seem not to be well publicised. (Perish the thought that this might be in any way be deliberate!!

Regards,

Tom Wheating.

11 - Representation from Nick Beddoe

Nick Beddoe <nbeddoe@savills.com>

To whom it may concern,

I write on behalf of the Maristow Estate, for whom we have been instructed to prepare a Consultation Response to the Draft Neighbourhood Plan. At this point I am writing to confirm the deadline for such submissions in order to ensure that our response is received with the required timescales to allow its consideration. May you please confirm the date of this deadline? Furthermore, it is intended that our response be submitted as a PDF document and so I would appreciate it if you could provide me with an email address so that this may be sent as an electronic attachment (in addition to a postal submission).

DNPA have approved a planning application for the cycle path from the Ellas towards Princetown but not this section. The PC will engage with DCC and DNPA to ensure a satisfactory route from the end of the existing path to the beginning of the new one.

See Maristow input below.

Yours faithfully,

Nick Beddoe

12 - Representation from Mr M Wood (representing several residents in Crapstone

The 103 signatories to this letter write in response to the public consultation for the BMPC Neighbourhood Plan (NP). We are residents concerned that the protections contained within the NP against further expansion on the 5.41 acres of land east of Yelverton Business Park (YBP) are porous. We believe they will be tested again by predacious attempts to force development on this Greenfield AONB site. Given the material weight afforded to the NP, we urge the neighbourhood planning team adopts a robust and determinate stance that reflects the demonstrable local opposition against such an outcome.

This input is in regard to a specific application to extend the current Business Park at Crapstone. The NP has considered this potential development (rejected by the Parish Council and LA but now the subject to an appeal) and the NPSG considers the policies within the NP are adequate to reach a conclusion on such applications..

Background

The renewed attempt to develop this site, under cumulative weight of applications 4005/16/FUL and 4006/16/FUL, constitutes a major development for the rural hamlet of Crapstone. This was the unanimous finding of the BMPC Planning Committee at a meeting held on 27 February 2017. The applications were also opposed by the Dartmoor National Park (DNP) and the Tamar Valley AONB (TVAONB), who together represent the statutory consultees. And the applications have been opposed via some 330 letters or online objections from local residents. With respect to application 4005/16/FUL, the ratio of stated Ward-member opinion

is some 29:1 against.¹

The developers have deliberately sought to wear down residents by; withdrawal and re-submission in quick succession of application 2172/16/FUL over Christmas, by splitting the fresh application in two in order to foreshorten the consultation response period by evading the procedural planning guidelines on what constitutes a ‘major’ development, and by a misleading PR campaign that stated that the fresh application was ‘on a vastly reduced scale’.² The developers look to exploit policy OP19 that featured briefly in the draft of WDBC’s ‘Our Plan’ (2015). This was discarded - again after overwhelming opposition - when Our Plan evolved to become part of the Plymouth and South West Devon Joint Local Plan. The draft JLP, together with your own Neighbourhood Plan, actually strengthens the policy framework against these proposals.

Applications for the site have been either withdrawn or rejected over the course of 4 previous attempts to expand or seek a change of use³, plus allocation for it in the defunct OP19 policy, yet this zombie scheme lives on. The present applications remain under consideration and will be determined by WDBC in April. But, in the event that they are refused, we have little confidence that the community will be spared further harassment from this, via various procedural or policy mechanisms to force it, such as through an application of such limited scope that it can only set the precedent for more.

Issue

¹ As at close of original online consultation deadline, 23 February 2017.

² The Yelverton Business Park Update February 2017 – mailshot, originator unknown. Application 2172/16/FUL had sought 2,144m² of B1(A/C), B2, B8, D1 usage.

³ 2008 - planning application 12273/2008/TAV, 2009 – 13262/2009/TAV, 2010 – 00396/2010/TAV, and 2016 - 2172/16/FUL

We are grateful that YBP is given careful and even consideration in the NP. But we do not believe the present document either a) adequately reflects or endorses parishioners' repeated, overwhelming *and growing* rejection of further Greenfield expansion here, sustained since 2008, nor b) does the wording of policy ED1 prevent predacious or speculative moves that would have the effect of incrementally expanding the site. In particular, the emphasis placed on 'Major Development' status should be revisited in light of the current round of responses. A full explanation for our reasoning is at the Annex.

Recommendations

We respectfully submit to the Planning Team that, for the purpose of the draft NP, either specific provision is made to reject the site out of hand for further Greenfield expansion, or the policy contained within ED1 is revisited to bolster the weight given to 'major' status by additional protections against 'minor' schemes. The former is our preferred option to prevent further wasted effort in opposing YBP expansion. But with regard to the latter, an alternative formula could refer to:

- a. The criteria for sustainable development set out within the TVAONB Management Plan under section 9.8, noting the overarching matter of whether any development is compliant with the primary purpose of the AONB to conserve and enhance natural beauty.
- b. For applications not judged to be a 'major development' in accordance with the 2015 DMPO, that they will be rejected where there is currently no employment allocation for the site or where ready-built commercial alternatives exist. Application therefore falls to be determined against the

(WDBC) Core Strategy⁴ policies (and in future the Joint Local Plan) and the NPPF.

Summary

Further expansion of YBP into adjoining Greenfield sites is wrong for Crapstone; a hamlet which immediately borders the DNP and sits inside the TVAONB. It is not in 'scale or in keeping' with the community, its needs or the supporting infrastructure. It will change Crapstone from a residential community to an industrial satellite against the demonstrable wishes of the overwhelming majority. And no 'exceptional circumstance' exists that could justify contravention of either the NPPF or WDBC's Core Strategy. We are grateful for the planning committee's recommendations on applications 4005 and 4006/16/FUL but are concerned that these were a carefully calibrated attempt to slip a major Greenfield development 'under the radar' ahead of the JLP and the 'material weight' afforded to the NP. The developers persist despite:

- four public, recent and overwhelming opposition campaigns to this same expansion, which, in 2010, was rejected by the WDBC Licensing and Planning Committee,
- *plus*, public rejection of WDBC's 'Our Plan' policy OP19 for the site,
- *plus*, routine formal objection by the TVAONB and DNP⁵
- *plus*, the clear direction of travel to protect hamlets such as Crapstone from unsustainable, unwanted and unnecessary development, as contained in the forthcoming Plymouth and SouthWest Devon Joint Local Plan, instead placing such major industrial developments in areas of existing conurbation and sustainable infrastructure.

⁴ WDBC - Local Development Framework Core Strategy Development Plan Document (2006–2026) adopted April 2011

⁵ See also DNP email objection: Mr C Hart, Planning Application ref 2172/16/FUL ; Extension to Yelverton Business Park, 29 September 2016 14:49

- *plus*, the ready availability of alternative, built sites for both industrial and office purposes.

We cannot ‘un-invent’ YBP despite it being largely irrelevant to Crapstone’s economic, social or sustainability needs. But the fact of YBP does not provide cause to make it any bigger. YBP was built a decade before AONB status was granted; there is zero chance it would exist under the protections this now provides. But we urge further and robust tightening of the provisions regarding the potential to expand it within the NP, to stop once and for all the repeated attempts to force this issue over local objections.

Signatories:

Michael and Lisa Wood, residents
Ian and Kristin Vincent, residents
Jan and Sarah Hughes, residents
Kenneth J Gilbert, resident
Jo and Mike Smart, residents
Mary Grafton and Graeme W McCabe, residents
Mr M J Leece, residents
Mrs P Leece, resident
Miss Y D Leece, resident
Mr R A Gunther, resident
Mrs J K Gunther, resident
John and Christine Bousfield, residents
Ian Smith, resident
John Dawes, resident
Sue Mackenzie-Philps, resident
Bertie and Bryony Hancock, residents
Derek and Jenny Mahoney, residents

Jodie and Phil Payne, residents
Deborah and Alexandra Kublin, residents
Mark Perry, resident
Dr Martin B Walker and Mrs Louise S Walker, residents
Michael, Sandra and Alex Phelan, residents
Ian and Teresa Thompson, residents
Oliver Field, resident
Graham Eagle, resident
Alison Measelle, resident
John Brodribb, resident
Wendy and Charlotte Stead, residents
Sarah Dean, resident
Paul and Gill Saunders, residents
Chris and Jacqui Anderson, residents
Mike and Linda Boxall, residents
Jonathan and Sarah Unsworth-White, residents
Andrew and Tracey Pett, residents
Miss Clare Dash, resident
Mr Wayne Ducker, resident
Mrs Louise Lyons, resident
Mrs L M Carter, resident
Mr David and Mrs Jane Sowerby, residents
Mrs Marilyn Pearn, resident
Mr Jon Pearn, resident
Peter and Sally Challis, resident
Sue Woollacott, resident
John and Di Friend, residents
Rob and Fiona Burbage, residents
Ken Farnham, resident
Richard Goodfellow, resident

Type to enter text

Clive Ribbons, resident
Nikki May, resident
Ursula Kennedy, resident
Peter and Sue Stevens, residents
Sue and David Behenna, residents
Fiona and Phil Harvey, residents
Lesley Thomson, resident
Tony Sprague, resident
Peter and Guida White, residents
Mike Aldred, resident
Richard and Sally-Ann Benham, residents
Livia Germano, resident
Jane and Simon Scott, residents
Dr Stuart and Maria Scott, residents
Mr and Mrs Loraine Francis, residents
Mark and Linzi Tynan, residents
Sally Butcher, resident
Laurence Larkin, resident
Mrs J P Wanstall, resident
Julie Jolly, resident
Mrs M Cossey-Haggar, resident
Biddy Grey, resident
Joanne Ryder, resident

Copy to:

Dartmoor National Park Authority
Natural England
Campaign for the Protection of Rural England
Tamar Valley AONB

Buckland Monachorum Parish Council Clerk
Councillor Philip Sanders WDBC
Councillor Ric Cheadle WDBC
Michelle Bennett WDBC

Annex: Amplifying Comments and Reasoning

ANNEX A - AMPLIFYING COMMENTS AND REASONING

Neighbourhood Plan Policy towards YBP Expansion

We are grateful that YBP is given careful and even consideration in the NP. But we do not believe the draft document either a) adequately reflects or endorses parishioners' repeated, overwhelming *and growing* rejection of further Greenfield expansion here, sustained since 2008, nor b) does the wording of policy ED1 prevent predacious or speculative moves that would have the effect of incrementally expanding the site. In particular, the emphasis placed on 'Major Development' status should be revisited in light of the current round of responses in relation to applications 4005/16/FUL and 4006/16/FUL, which are specifically designed to subvert this condition. Draft paragraph 6.24 reads:

Economic Development Policy 1: ED1 - Meeting the Economic Development need

Economic Development will be supported provided it meets the following criteria: (b) it can demonstrate an ability to provide local employment opportunities. (c) **it does not constitute Major Development within the AONB unless supported by Exceptional Circumstances tests as set out in para 116 of the NPPF. (emphasis added)** (d) it is subject to a satisfactory traffic assessment (e) the proposed business use is appropriate to a rural location (f) it complies with the other Policies in the NP

The Issue of ‘Major’ Development

It is clear that the applicants have centred their latest argument on attempts to circumvent the planning import attached to ‘major’ development status, given the particular protections afforded by the National Planning Policy Framework (NPPF) to AONB status under paragraph 116.

But the precise scope of the term is contentious. Confusion exists due to contradictory rulings between the Town and Country Planning (General Development Procedures) Order 2010, the judgement of the 2013 High Court case of *Aston v Secretary of State for Communities and Local Government* [2013] EWHC 1936 (Admin), and the absence of a fixed interpretation in the NPPF.

Our group has received legal advice that these confusions were specifically resolved in *The Town and Country Planning (Development Management Procedure) (England) Order 2015* which came into effect on 15 April 2015 replacing the

previous 2010 DMPO.⁶ This being said, we note that the TVAONB take a view which does not reflect the 2015 revision. Their recent response noted that:

‘...since that judgment in 2013 applications have been assessed based on their impacts to the AONB and an opinion formed as to whether those impacts are regarded as making the application "major" in the terms of paragraph 116 of the NPPF. Whilst this is not as precise as relying on the various scales of development set out within the 2010 Order it does enable for the LPA to consider development in terms of its impacts and not simply by the area of land covered by a development or the quantity or size of buildings proposed. In light of the above the adopted TVAONB Management Plan 2014-2019 seeks to clarify what would make a development “major”. The parameters for which are set out within section 9.9 of the Management Plan as follows;

1. Where the scale of development is likely to have a detrimental visual impact that harms the scenic quality of the AONB, either within the AONB or in its setting;
2. Where the location of development would erode the special qualities and features of the area of the AONB where the development is proposed (landscape, cultural, biodiversity, tranquillity, etc.);
3. Where the type of development is not directly compatible with its surroundings; and/or
4. Where the development would conflict with the economic and social needs of local communities and the AONBs guiding principles of sustainable development.’⁷

Doubt Over the Continued Material Relevance of ‘Major’ designation.

⁶ The PDF web link is http://www.legislation.gov.uk/uksi/2015/595/pdfs/ukxi_20150595_en.pdf

⁷ TVAONB LOR Yelverton Business Park dated 20 February 2017

Irrespective of this debate, we argue that the emphasis given to ‘Major’ status is no longer sufficient here. And we note that it did not form the basis of the arguments rejecting AONB development by either WDBC, the statutory consultees, or the Planning Inspectorate. We observe the following:

a) Under WDBC’s Strategic Policy and Objectives, contained in the Local Planning Policy Framework,⁸ the issue of ‘major’ status is not a material consideration in relation to the specific protections afforded to the TVAONB and DNP under Strategic Policies 1 (sustainable development) or 17 (landscape character). And Strategic Policy 24 (sustainable rural communities) also places emphasis on ‘scale and keeping’, the reinforcement of ‘local character’ and protection to ‘natural landscapes’.

b) Both DNP and TVAONB opposed applications 4005/16/FUL and 4006/16/FUL for development on the site, individually and collectively, without reference to ‘major’ qualification:

(i) The DNP response of 7 February 2017 cited the ‘unacceptable impact of additional traffic on the amenity of users of the national park, and the major urbanising effect that would be created, which is detrimental to the settings of the national park from the new units.’ With respect to the Meeting Hall, it noted that it was ‘an unsustainable form of development in an open countryside location outside of a recognised settlement boundary.’

(ii) The TVAONB response of 20 February 2017 noted: ‘we have assessed the schemes both individually and also collectively. We

⁸ WDBC - Local Development Framework Core Strategy Development Plan Document (2006–2026) adopted April 2011

remain concerned that the overall development whilst reduced in scale, will result in impacts that do not enhance or conserve the natural beauty of the AONB landscape. Given the above we are of the view that the applications as they stand would not fully accord with Policy SP17 of the West Devon Core Strategy or paragraph 115 of the NPPF. In those terms we feel that the application will need to be assessed by the LPA in light of footnote 9 to paragraph 14 of the NPPF.’

c) The casework precedent set by a 2015 Planning Inspectorate⁹ decision in respect of an appeal for an application to build three houses on Green Lane, Axtown (in sight of YBP). The response is worth quoting at length:

‘Nearby visibility of the proposal would be limited to roadside views over the embankment between vegetation, through the entrance and from nearby private property. The appellants assert that there are no significant public vantage points from which the site could be seen. However, I have found that the proposal would have a significant harmful effect when seen locally, particularly from Green Lane. Furthermore, the appeal site is open to distant views from a relatively wide area.’

The Planning Inspector refused the application on the basis that ‘the proposal would fail to conserve the landscape and scenic beauty of the Tamar Valley AONB, or the character and appearance of the area more generally. The proposal would therefore be contrary to CS Policy SP17(a), CS Policy SP1 criterion (i) and Local Plan Policy NE10 criterion (ii).’ These same material concerns exist for YBP expansion.

⁹ (Planning Inspectorate reference APP/Q1153/W/16/3145211, West Devon Planning reference 00727/2015)

The Dangers of ‘Incrementalism’ and ‘Dilution’

A pattern of behaviour exists with intent to achieve some form of YBP expansion, and thus realise development profit. We expect further applications will attempt this piecemeal. We were heartened by the BMPC planning committee’s rejection of the plainly collusive, stand-alone ‘trojan horse’ Brethren Church meeting hall. But we seek protection from similar ‘one-off’ attempts on this site, which would set the precedent for incremental expansion – and more significantly, given the flimsy pretext – set a precedent for a surge in similar claims against the AONB. The developer has form here, and neither the Parish nor West Devon can give a legal guarantee to stop further expansion of YBP unless NP policy is strengthened to accord with the local view.

And there is the obverse danger of ‘dilution’. In the judgement of the 2013 High Court case of *Aston v Secretary of State for Communities and Local Government* [2013] EWHC 1936 (Admin) Justice Wyn Williams was clear that he looked for the intent of NPPF when deciding the definition of “major development”. The intent in the NPPF is that AONB’s must not be spoilt by development. The accumulated degradation arising from developments in the AONB (whether ‘minor’ or ‘major’), must not lower the bar to assessing further development.

Recommendations

We respectfully submit to the Planning Team that, for the purpose of the draft NP, either specific provision is made to reject the site out of hand for further Greenfield expansion, or the policy contained within ED1 is revisited to bolster the weight given to ‘major’ status by additional protections against ‘minor’ schemes. The former is the preferred option of the signatories, to prevent further wasted effort in opposing YBP expansion. But with regard to the latter, an alternative formula could

refer to:

- a. the criteria for sustainable development set out within the TVAONB Management Plan under section 9.8, noting the overarching matter of whether any development is compliant with the primary purpose of the AONB to conserve and enhance natural beauty.
- b. For applications not judged to be a ‘major development’ in accordance with the 2015 DMPO, that they will be rejected where there is currently no employment allocation for the site or where ready-built commercial alternatives exist. Application therefore falls to be determined against the (WDBC) Core Strategy¹⁰ policies (and in future the Joint Local Plan) and the NPPF.

Other Issues

We note in NP paragraph 3.6 that feedback is sought on the following:

- The need for a restriction on converting land from 'employment' to ‘non employment' (i.e. residential)
- The need to control the use of Brown Field land (to ensure it is used for development ahead of open land¹¹)

There is a clear and difficult duty to balance development and conservation, but we feel that public opinion must trump particular commercial schemes when it is so robustly and uniformly expressed. The signatories agree the needs for restrictions and controls described above to be included in the NP. We also wish to draw

¹⁰ WDBC - Local Development Framework Core Strategy Development Plan Document (2006–2026) adopted April 2011

¹¹ 'The Neighbourhood Plan For The Parish Of Buckland Monachorum' Version 4.4 dated November 2016 p11

attention to other tentative moves to force analogous development, including attempts at greenfield house-building outside of Crapstone's settlement boundaries at Green Lane and on the Golf Driving Range. Particularly in light of the 2015 planning inspectorate appeal decision, we would welcome a specific view on these within the NP.

13 -

I attended the consultation meeting regarding the above held on 4th March in the Church Hall Yelverton.

I am alarmed to hear that a large site close to Meavy Lane had been earmarked for possible development. I am concerned that the access to the site will cause great traffic disruption for everybody living nearby.

Meavy Lane, which is already at saturation point, is the nearest road to the site. It is incomprehensible that further traffic from 30 additional houses should exit on to it. Not only will it add to congestion in Meavy Lane but will result in further problems at the Yelverton roundabout.

Two alternative routes were discussed, albeit briefly and without any close detail. This involved building a road from the site through the land below St Paul's church to join Plymouth road via the church carpark or up through Station Road, which is privately owned. (You will note from the above mentioned address that I live on Station Road). The term 'compulsory purchase' was bandied about, with reference to any difficulty that might be encountered with the owners of these parcels of land and the road.

I have spoken to Lady Kitson, who owns both the site and Staten Road. She assured

Type to enter text

me that she would not trigger the development until such time as her house and grounds would be considered for sale. Without wishing to be indelicate, Lady Kitson said that this would be after her demise, because if planning permission were granted it would enhance the value of here property for her heirs. I do not find this reassuring.

I also note that the land in question lies outside the Settlement Boundary for Yelverton. It has been suggested that this difficulty be dealt with by the simple expedient of re-drawing the Boundary

I therefore object in the strongest possible terms to site in question being in the Neighbourhood Plan for future development.

Yours sincerely
Mrs A V Thomson

Representation from John Boston

John Boston <john.boston@plymouth.ac.uk>

I strongly support any plans for new properties in Yelverton suitable for older downsizers. There are many in the village who would be happy to move to a smaller property that is close to the centre of the village, so I hope the community develops a bigger plan than was discussed today (4th March) as a plan for 15-20 houses is too small. I am aged 55 and seek to plan to the future (it will take time for any development to happen!).

I support the current plan for development down Meavy Lane (Number 5 on the map shown today, 4th March 2017).

A year ago the idea was mooted for residential development by the Leg O' Mutton; I see no reason why this could not proceed even if the main road is not diverted. I would be happy to move there.

In my opinion there was insufficient publicity for the consultation meeting today. Very few people were present, and I do not believe it is due to a lack of interest from the community. Many more attended the meeting a year ago. It was very hard to find out the way to provide a comment (despite repeated questions to R. Cheadle). The risk of low publicity is that you will hear only from objectors/NIMBYs and that nothing will ever happen.

Are you getting bogged down with too many issues? The website shows a plethora of ideas, but little apparent focus on the need for residential development in the largest location in the community: Yelverton. If you try and cover everything at the same time nothing will ever happen!

I am happy to help, eg with the delivery of info to every household. When I retire I will be able to help more.

Regards,
John Boston

14 - Representation from Dan (surname unknown)

Dan <danr11@hotmail.co.uk>

You mentioned that it is up to the County Council whether we are permitted to have an upgrade to Fibre Optic/Super Fast Broadband. However surely the parish council can discuss and put forward and push to the County council for us to have it available to us.

All we have is slow connection that doesn't even exceed 2Mbps! And it is forever dropping out. It is pathetic to say the least how poor the internet is around here.

We are forever waiting news on something that seems will never come because which is depressing as the connection is becoming slower and slower, we get more and more drop outs. Everyday we are battling and trying to put up with this poor connection.

I just wish that someone with more influence than myself could see it as truly bad as I see it and to push for something to be done about it.

15 - Habitat Regulation Assessment recommendations

The Likely Significant Effects test enabled all policies within the draft Buckland Monachorum Neighbourhood Plan to be screened out from impacting upon European designated sites alone. However further investigations were required in combination with other projects and plans of the following impact pathways:

- Recreational pressure
- Hydrological changes
- Air quality

To ensure that the Neighbourhood Plan does not result in likely significant effect upon European designated sites the following recommendations were made.

Recreational Pressure Relating to Plymouth Sound and Estuaries SAC and the Tamar Estuaries Complex SPA

Since the Local Plan is not yet adopted, for robustness it is recommended that the requirement for developments to contribute to avoidance and mitigation measures as provided within Joint Local Plan policy SPT13 is provided for either within Plan policy or at least clarified in supporting text.

Water Quality Relating to Plymouth Sound and Estuaries SAC and the Tamar Estuaries Complex SPA

Policies within the Joint Local Plan make specific reference to a requirement for any new or improved sewage/water treatment infrastructure to be in place before housing (or other) development takes place to ensure no adverse impact on European Sites to which the Neighbourhood Plan will accord. **Given this it is recommended that this same requirement is introduced to the Neighbourhood Plan.**

Advice from the LA is not to duplicate policies within the JLP and NP

Providing these recommendations are incorporated within the Neighbourhood Plan, it can be concluded that it will not impact upon the integrity of any European designated sites either alone or in combination.

The submission below, from Maristow Estates was submitted when a possible plan for the redevelopment of Yelverton was under consideration. Since submission, this proposal has been dropped and so the comments no longer are applicable to the NP

16 - Maristow Estates

Buckland Monachorum Neighbourhood Plan Response on behalf of the Maristow Estate

1.0 Introduction 1.1 Scope and background

- 1.1.1 This consultation response has been prepared by Savills (UK) Ltd on behalf of The Maristow Estate. The submission has been prepared following an invitation from the Buckland Monachorum Neighbourhood Planning Team to comment upon the draft Neighbourhood Plan for the Parish. As the online

response page allows only limited responses to be provided, our submission is included wholly within this written report.

1.1.2 The Estate are supportive of the community's decision to produce a neighbourhood plan and are keen to ensure that local residents remain at the heart of its preparation. As such the Estate wishes to support the overall vision expressed within the plan, and this response does not seek to exert undue influence over the specific policies which it contains.

1.1.3 The Maristow Estate extends to approximately 6,000 acres in the area around the northern fringe of Plymouth and towards the Tavy Estuary. Hence, as a significant owner of land within the Plan area, the Maristow Estate are well-placed to facilitate the development required to realise the strategic aims of the plan. Therefore, this representation is consistent with the Plan's aim that its vision should be delivered through 'a thoughtful and integrated approach. . with landowners and developers taking a continuous interest in the future of the Parish Community'.

1.1.4 In particular, this response is focused upon the settlement of Yelverton and the emerging vision for a mixed-use development in the western area of the village near Leg of Mutton and the A386 roundabout. Being aware of the specific local challenges faced in Yelverton, The Estate has previously developed conceptual plans for a notional redevelopment of this area, in an attempt to demonstrate the ways in which these issues could be resolved through an ambitious and holistic development scheme. These plans were presented an independent consultation event last year, which sought to gauge public opinion on the prospect of such development. The feedback gathered through this process has been highly informative and is referenced later in this consultation response. The plans themselves are included within Appendix 1 of this response.

1.1.5 As these plans were presented after the initial Neighbourhood Plan consultation they were not

Buckland Monachorum Neighbourhood Plan Response on behalf of the Maristow Estate

considered in the initial Parish questionnaire or feedback sessions. However, the Neighbourhood Plan Group have since included a reference to these plans under paragraph 6.22 of the draft plan (highlighted yellow to indicate their later inclusion). This states:

“Secondly, during the course of the Plan’s development, a concept of additional development around Yelverton (Leg of Mutton) emerged in discussions between the Parish Council and Maristow Estates. This would probably involve a mixed development; part commercial, part residential and part community although at this time no formal proposals have been submitted and so no assessment of whether this would be in the interest of the Parish can be made. However, the Neighbourhood Planning Team recognised that this could make a useful contribution to housing numbers, economic and community development, and that development around Yelverton was more appropriate than in many other areas within the Parish where services are scarce. As with the Business Park, it was considered that such development should be covered by policies should, at some future time, they become planning proposals.”

- . 1.1.6 Due to the conceptual nature of the abovementioned plans, it is accepted that the Neighbourhood Plan Group are somewhat limited in their ability to provide detailed comments on the relative merits of the development proposals. However, the Estate is encouraged by the Group’s appreciation of the positive contributions which the scheme could facilitate, and that the village of Yelverton is recognised as the most appropriate location in which to accommodate such development.

- . 1.1.7 As such, this response seeks to reinforce the general position of the draft plan but also endeavours to firm-up its commitment to the principle of the emerging development proposals. The Estate’s case is based upon the presentation of new evidence including the content of Devon County Council’s ‘Options Assessment Report’ and the responses received through the Maristow Estate’s consultation event in relation to the plans.

The Maristow Estate March 2017 2

Buckland Monachorum Neighbourhood Plan Response on behalf of the Maristow Estate

2.0 Planning Policy Context

2.1 National Policy

2.1.1 The National Planning Policy Framework 2012 (NPPF) sets out the National Tier of planning policy for England. The supporting Planning Practice Guidance provides Government guidance on how these planning policies should be interpreted and applied.

2.1.2 The NPPF describes how Neighbourhood Plans should be prepared and explains the relationship which they should have with the Local Plan. In this respect, Paragraph 184 explains that:

... “The ambition of the neighbourhood should be aligned with the strategic needs and priorities of the wider local area. Neighbourhood plans must be in general conformity with the strategic policies of the Local Plan. . . Neighbourhood plans should reflect these policies and neighbourhoods should plan positively to support them. Neighbourhood plans and orders should not promote less development than set out in the Local Plan or undermine its strategic policies.”

2.1.3 Paragraph 185. States that:

“Once a neighbourhood plan has demonstrated its general conformity with the strategic policies of the Local Plan and is brought into force, the policies it contains take precedence over existing non- strategic policies in the Local Plan for that neighbourhood, where they are in conflict. Local planning authorities should avoid duplicating planning processes for non-strategic policies where a neighbourhood plan is in preparation.”

2.1.4 Hence, to summarise the position, the plan must conform with the general strategic policies of the overarching local plan(s), but can override these plans in respect of specific local policies and development allocations.

2.2 Local Planning Policy

- . 2.2.1 The Buckland Monachorum Plan Area stretches across two local planning authorities, West Devon Borough Council and the Dartmoor National Park Authority.
- . 2.2.2 For areas falling within the West Devon Authority, the extant Local Development Framework

The Maristow Estate March 2017 3

Buckland Monachorum Neighbourhood Plan Response on behalf of the Maristow Estate

(comprising the 2011 Core Strategy, Proposals Maps and Settlement Maps) is currently the relevant Development Plan. However, West Devon Borough Council are currently working collaboratively with Plymouth City Council and South Hams District Council to produce a Joint Local Plan covering all three planning authority areas. This Joint Local Plan is gathering weight as it proceeds towards adoption, however the extant West Devon Plan is still relevant where it complies with the NPPF.

2.2.3 For locations falling within the National Park Area the ‘Development Management and Delivery Plan’ (DMD) is currently the pertinent Development Plan. The village of Yelverton falls within this area and therefore, the Neighbourhood Plan policies relating to the village must accord with the strategic aims of the DMD.

- . 3.0 Assessment of Challenges and Opportunities
- . 3.1 Estate’s view on local issues

. 3.1.1 Amongst other issues, the draft neighbourhood plan identifies the following local challenges of relevance to Yelverton:

The need for a wider variety of affordable local housing and the challenge faced in delivering this in a location nearby to local services (bearing in mind that Yelverton holds most services but lies within the National Park where no specific housing targets apply).

The need for more parking in the village to support local businesses

The desire for a new community facility or visitor centre

The need for improved footpaths and cycle paths in the area

. 3.1.2 The DMD Plan for Dartmoor National Park also recognises the need to provide a ‘wider range of accommodation opportunities to meet the needs of local people’. This is considered to be a symptom of the demographic challenge resulting from the village’s ageing population. The Plan also recognises that the village is currently ‘divided by the junction of the busy A386 and B3212’ roads.

. 3.1.3 At a regional scale the Estate is aware that the Joint South West Devon Plan has highlighted the need for enhanced transport infrastructure to facilitate improved connectivity between the city of

Plymouth and the settlements within its rural hinterland.

3.1.4 The growth of Tavistock is known to be constrained by shortcomings in the highway network and the plan therefore intends to provide for improvements to the A386 between Tavistock and Plymouth. The road is recognised as a ‘vital route into the city from the communities to the north’ and as the key gateway for people coming in from West Devon, South Hams and the Dartmoor National Park.

3.2 Estate’s view on opportunities

- 3.2.1 In addition to above mentioned development plan documents, Devon County Council have also considered the potential for improved transport connectivity between Tavistock and Plymouth. In this respect, the Council have published an ‘Options Assessment Report’ (OAR), which outlines the various options for improving connections between the two settlements and appraises the relative merits of each approach. These options include:

The potential for new and improved public transport connections (including rail, tram and guided bus)

Improved pedestrian routes and cycling trails

Highway Improvements to the A386

- 3.2.2 In considering the potential Highway improvements, DCC have focused the need for these upgrades upon two distinct sections of the road, which are identified as the slowest segments of the route between the settlements. Shown below on Figure 1, these are a one mile section between Grenofen and Whitchurch, and the stretches of road either side of Yelverton roundabout.

- 3.2.3 In considering the ‘problems and objectives’ associated with the potential A386 improvements, the document summarises the key challenge as follows:

“It is the only significant route into Plymouth from Tavistock and West Devon but is congested particularly within the city. A significant quantity of development is planned on the A386, also known as the northern corridor into Plymouth, and there is a limit to how this can be accommodated. Improvements to the A386 will help to accommodate growth along the whole route.

It would be possible to provide a pedestrian and cycle route along the former railway corridor if improvements to the A386 were implemented.”

The Maristow Estate March 2017 5

Buckland Monachorum Neighbourhood Plan Response on behalf of the Maristow Estate

- . 3.2.4 This demonstrates that the need to upgrade this route is acknowledged by the relevant authorities and that such improvements would accord with the wider strategy for the city region.
- . 3.2.5 The development of the site could generate important funds which could be directed towards these improvements, to the benefit of both local people, regional commuters and visitors from further afield.

Figure 1: Prospective A386 Highway Improvements considered under OAR report _____

The Maristow Estate March 2017 6

Buckland Monachorum Neighbourhood Plan Response on behalf of the Maristow Estate

3.3 Opportunities identified through public consultation

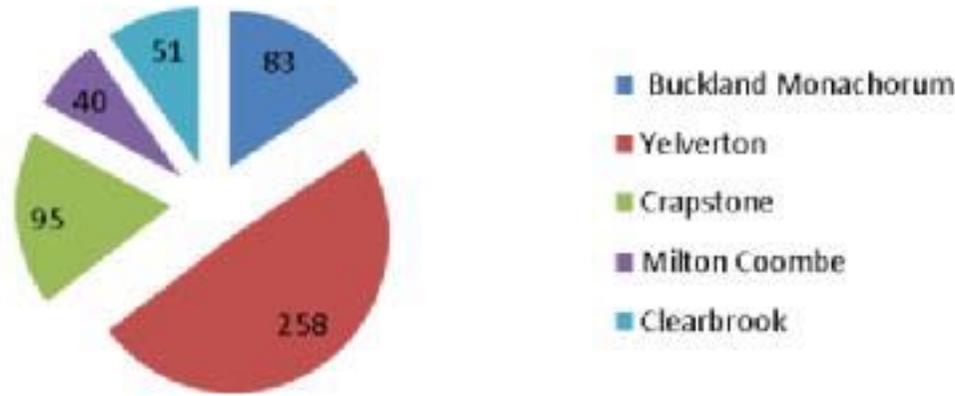
- . 3.3.1 The evidence gathered through both the Neighbourhood Plan Process and the Estate’s own consultation event indicate that there is a degree of support for the various improvements specified under the conceptual plans.

- . 3.3.2 In preparing the draft Neighbourhood Plan a Housing Needs Survey was undertaken and published in March 2013. This received 537 responses (a response rate of 31.7%) and indicated that most respondents would favour a small local development to meet the needs of local people, and that Yelverton would be the most preferable location for such development.

Figure 2 Buckland Monachorum Housing Needs Survey – March 2013

- . 3.3.3 The draft neighbourhood plan reflects this local outlook and paragraph 2.12 of the plan explains that the questionnaire responses and supporting evidence points to two main issues in relation to local housing. These are:
“The need for housing which sustains the community and in particular that which provides for young families who wish to grow up and contribute to the community in which they live and secondly, for the more senior members of the community who, again, wish to remain but may not be able to find accommodation suited to their changing circumstances.”
- . 3.3.4 The plan also notes that although the 96% of respondents valued the local shops at Yelverton, they held reservations over the provision of adequate parking to service these.
- . 3.3.5 Specific feedback on the conceptual plans was gathered through the Estate’s own public consultation event. In all, 140 people attended the event and 97 feedback forms were completed. Both the

Fig 1: Preference of for a small development



The Maristow Estate March 2017 7

Buckland Monachorum Neighbourhood Plan Response on behalf of the Maristow Estate

Feedback forms and the event itself have provided a useful reflection of public opinion.

3.3.6 It is fair to say that the response to the proposals was mixed, with approximately 50% supporting some form of development and 50% of respondents opposing the plans altogether. Although this kind of response is fairly typical for emerging development proposals, it was interesting to see that many respondents had only opposed the scheme on the basis that insufficient detail had been provided on the plans. However, the intention of the plans themselves were merely to facilitate discussion and to generate feedback on the principle of the development. It was not to seek local approval of specific details as the plans were, by their very nature conceptual.

3.3.7 Nonetheless, the feedback forms did provide some useful commentary in respect of the key issues which the development concept seeks to address. A summary of these responses is provided within Appendix 2 in relation to the main issues of Housing, Retail, Parking and prospective highway improvements. This includes the following comments:

“Agree on concept but current idea is still a village divided by a trunk route i.e. the A386.”

“Move the A386 back to where it was before the war and give us back a central ‘village green’. As it is the road or roundabout split the village into three parts”

“No objections to improving the area in principle but until the roads are able to absorb the traffic I cannot see these proposals working”

“No objections to additional homes as long as the infrastructure is addressed” “Proposals seem modest. Is there scope for additional development”

“Connectivity between retail areas likely to be frustrated by traffic volume on the A386 notwithstanding second roundabout”

“Good parking not only encourages people to come from surrounding villages but enables easier commute to Plymouth as the Park and Ride at George Junction is congested”

3.3.8 These comments provide useful guidance in respect of the emerging proposals. They also indicate that there is a significant local appetite for some development to occur in Yelverton which addresses the village’s main issues and challenges. The comments would help to shape the further development of the proposals and the Estate wishes to ensure that the local community remain engaged with the process.

The Maristow Estate March 2017 8

Buckland Monachorum Neighbourhood Plan Response on behalf of the Maristow Estate

4.0 The Concept of Proposed Development

. 4.1 Summary

. 4.1.1 The Maristow Estate is a major landowner within the area and frequently reviews its landholdings in order to identify opportunities to contribute to local plan making and delivery of development. Being aware of the various challenges faced at a local and regional scale, it became apparent to the Estate that an opportunity might exist to address these through a vision of development for the village of Yelverton.

. 4.1.2 As an initial stage of investigating this potential it was decided that a preliminary design exercise be undertaken to flush out local views at a very high level. This exercise provided an opportunity to explore some creative ideas for how the development might take shape. The conceptual plans (shown in Appendix 1) were intended to highlight the range of opportunities presented by the prospective development and to demonstrate how the development could help to meet the specific local challenges faced within the village.

. 4.1.3 The exercise was based on a logical process of design, working from an initial ‘Constraints Plan’ and working through the opportunities towards some initial themes and notional design ideas. The culmination of this process is shown below in Figure 3.

. 4.1.4 The plans comprised the following key features within the design concept:

New visitor information/community facility

Improved pedestrian and cycle access

Additional parking for shoppers and visitors to the National Park

Reconfigured road layout to improve the A386 and ease local congestion

Areas of mixed-use development including retail, community and residential uses

The Maristow Estate March 2017 9

Buckland Monachorum Neighbourhood Plan Response on behalf of the Maristow Estate

Figure 3 'Initial Ideas' board presented at public consultation event

- . 4.1.5 The presentation of these plans at a public exhibition was intended to simply test the local appetite for development and to spark a conversation amongst local residents about the main issues in the village and the type of development which they would like to occur.
 - . 4.1.6 Attendees were invited to provide comments on these plans and their responses were captured on a standardised feedback form relating to the different aspects of the proposals (housing, retail, community use and parking). The outcome of this event is discussed in greater detail earlier in this response.
-

The Maristow Estate March 2017 10

Buckland Monachorum Neighbourhood Plan Response on behalf of the Maristow Estate

. 5.0 Summary of Response

. 5.1 Overview

. 5.1.1 The Maristow Estate is supportive of the overall vision expressed within the Draft Neighbourhood Plan and of the 10 strategic aims set out in Paragraph 5.

. 5.1.2 This response has specifically focused upon the settlement of Yelverton and the emerging ideas for a mixed-use development in the western area of the village near Leg of Mutton and the A386 roundabout. In light of relevant local planning policy and the evidence obtained through public consultation (in respect of the neighbourhood plan and the Estate's own consultation event) it is considered that these plans could help to achieve the following objectives:

Deliver the required development to meet a local need for a wider variety housing

Alleviate traffic congestion through the village and provide for much needed additional parking

Reconnect the village by breaking down the physical barrier of the A386 trunk road

Provide for a community facility – to be determined through further consultation

. 5.1.3 The proposals would accord with the strategic policies of the Dartmoor National Park's Local Development Framework, which is the pertinent Development Plan to the village. It is also possible that the planned development could help to enable the strategic planning objectives of the wider region, as outlined within the emerging Joint South West Devon Plan. In particular the

plans would enable the reconfiguration or re-routing of the A386, cutting out a known bottleneck along the Tavistock to Plymouth transport corridor and enhancing regional connectivity between key settlements within the Thriving Towns and Villages area.

- . 5.1.4 The Estate have identified a significant degree of local support for the proposals and would seek to maintain such engagement through the evolution of the plans.

- . 5.1.5 The draft Neighbourhood Plan has currently acknowledged that Yelverton would be the most appropriate location in which to accommodate this type of development. It further suggests that such

The Maristow Estate March 2017 11

Buckland Monachorum Neighbourhood Plan Response on behalf of the Maristow Estate

development should be “covered by policies should, at some future time, they become planning proposals”. However, it is unlikely that these plans would emerge within the timescales of the Neighbourhood Plan’s production. As such the plan would pre-date the inception of any firmed-up proposals in this respect and would effectively be silent on an very important local development prospect.

5.1.6 Therefore, it is felt that some form of pre-emptive policy commitment is required in order to ensure that the plan is future-proofed with regards to the emerging proposals. In light of the case made within this response, the Estate would encourage the Neighbourhood Plan to support this vision due to the potential that this offers for meeting the local and strategic aims of the plan area.

General comments and the prospective improvements to the A386

“Agree on concept but current idea is still a village divided by a trunk route i.e. the A386.”

“Move the A386 back to where it was before the war and give us back a central ‘village green’. As it is the road or roundabout split the village into three parts”

“No objections to improving the area in principle but until the roads are able to absorb the traffic I cannot see these proposals working”

“Overall ideas positive. A new A386 avoiding Yelverton roundabout would be a bonus” “Re-route A386 to pass Leg O’ Mutton, which will take pressure off Yelverton” Housing

“No objections to additional homes as long as the infrastructure is addressed” “Needed for local young people. Needs to be affordable”

“Proposals seem modest. Is there scope for additional development”

Retail

“More likely to succeed in more modern premises and proximity to current shops will help link to Leg O Mutton”

“Connectivity between retail areas likely to be frustrated by traffic volume on the A386 notwithstanding second roundabout”

“Competition for the Co-op would be beneficial”

Parking

“Currently a nightmare”

“Current Parking at the shops in Yelverton is not sufficient and can at times be hazardous”

“There needs to be more safe parking for shoppers”

“Good parking not only encourages people to come from surrounding villages but enables easier commute to Plymouth as the Park and Ride at George Junction is congested”